UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

17-cr-589-JKB

V.

:

FERMIN GOMEZ-JIMENEZ

:

MOTION TO ADOPT, JOIN, AND CONFORM TO MOTIONS, OBJECTIONS, OR OTHER APPLICATIONS FOR RELIEF FILED AND RAISED BY CODEFENDANTS

Fermin Gomez-Jimenez, by and through undersigned counsel, respectfully moves this Court, pursuant to Federal Rule of Criminal Procedure 12(b) and 47 as well as Local Rule 207, for the entry of an order granting Mr. Gomez-Jimenez leave to adopt, join, and conform to any motion, objection or other application for relief requested by any codefendant at any time in this proceeding, unless he expressly declines to join in a request made on their behalf. In support of this motion, counsel states the following:

- 1. Mr. Gomez-Jimenez is charged by indictment with multiple defendants.
- 2. Many of the motions, objections or applications for relief filed by codefendants will contain overlapping issues with Mr. Gomez-Jimenez. To the extent he has standing to challenge certain evidence or has a legal interest in an issue raised, he requests permission to adopt such requests or objections and adopt by reference any support memoranda and authority provided by codefendants in support of such motions.
 - 3. This would avoid duplication and should expedite matters for the Court.

WHEREFORE, for the foregoing reasons as well as any additional reasons deemed meritorious by the Court, counsel and Mr. Gomez-Jimenez request that the Court grant this motion and signed the attached order.

Respectfully submitted,

/s/ Jenifer Wicks

JENIFER WICKS MD Federal Bar No. 15573

Law Offices of Jenifer Wicks 6909 Laurel Avenue Suite 5419 Takoma Park MD 20913 Telephone (240) 468-4892 Facsimile (202) 478-0867 Jenifer@JWicksLaw.com

 $/_{\rm S}/$

TERESA WHALEN MD Federal Bar No. 25245

801 Wayne Avenue, Suite 400 Silver Spring, Maryland 20910 (301) 588-1980; (301) 728-2905

Case 1:17-cr-00589-JKB Document 115 Filed 02/28/19 Page 3 of 4

CERTIFICATE OF SERVICE

I hereby certify that I will electronically file the foregoing with the Clerk of Court using the CM/ECF system which will then send a notification of such filing to the other parties in this matter.

/s/Jenifer Wicks

JENIFER WICKS

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	:
	: 17-cr-589-JKB
V.	:
FERMIN GOMEZ-JIMENEZ	: : :
O	RDER
Based upon the MOTION TO ADOPT	, JOIN, AND CONFORM TO MOTIONS,
OBJECTIONS, OR OTHER APPLICATIONS	S FOR RELIEF FILED AND RAISED BY
CODEFENDANTS, the record herein and for	good cause shown, it is thisday of
2019 hereby	
ORDERED that the motion is GRANT	ED.
	Chief Judge James K. Bredar